

[Parties and Counsel Listed on Signature Pages]

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

This Document Relates To:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**JOINT STATUS REPORT ON FORENSIC  
IMAGING AND DEVICE DATA**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

1 Pursuant to Discovery Management Order No. 8 (Dkt. 1025) (“DMO No. 8”), the Parties jointly  
2 provide this report on Plaintiffs’ progress with respect to production, and the Parties’ progress in  
3 conferring on certain topics as directed by the Court.

4 As an initial matter, the Court ordered Plaintiffs to “produce a list of every model number of every  
5 relevant Bellwether PI Plaintiffs’ device” and “a full list and chart to Defendants of all the applications  
6 which are currently on the relevant Bellwether PI Plaintiffs’ devices Dkt. 1025, at 5-6. On July 15, 2024,  
7 Defendants sent Plaintiffs the draft Status Report Table attached at Appendix A and requested that  
8 Plaintiffs complete the table and meet-and-confer regarding other items discussed during the July 11, 2024  
9 discovery management conference related to identification of the Plaintiffs’ devices and the forensic  
10 images from those devices.

11 Today, Plaintiffs produced a spreadsheet to Defendants that Plaintiffs represent to includes device  
12 model numbers and the application lists available to Plaintiffs for nearly all Plaintiffs’ devices, as defined  
13 by DMO No. 8, at 8, with the exception of a few devices that are not accessible currently due to technical  
14 issues. Plaintiffs represent that they will supplement this disclosure as additional information becomes  
15 available and note that information on non-primary devices, including their model numbers, has been  
16 provided in responses to Defendants’ first set of interrogatories. Plaintiffs for whom responses to  
17 Defendants’ first set of interrogatories are not yet due will respond in accordance with their due dates.<sup>1</sup>  
18 Because the spreadsheet was only recently received, Defendants are reviewing and will evaluate the  
19 information just produced. The Parties intend to meet and confer further on the identification of relevant  
20 devices and applications.

21 Plaintiffs have not produced, and the Parties have not yet conferred on: (1) the data sets Plaintiffs  
22 discussed during the July 11 hearing, including “application usage data, browser history data, location  
23 data, communication logs, media files, metadata, application settings, and other data files reasonably and  
24 in good faith identified by Defendants as relevant to how the device user used that device during the  
25

---

26 <sup>1</sup> Defendants note that the Court instructed Plaintiffs, “don’t wait, start producing [this information] on a  
27 rolling basis and disclosing it now if you have it.” Tr. at 42:4–5. Accordingly, Defendants do not agree  
28 that Plaintiffs should wait until their responses to Defendants’ interrogatories are due to provide this  
information if it is available sooner.

relevant time period” (*id.* at 6); (2) search terms to be used for content-based material, such as email and text messages, because Defendants just today provided proposed terms to those that Plaintiffs proposed on June 19, 2024 (*see id.* at 7); and (3) the identification of various relevant settings for each device and what databases are on the devices (*id.* at 6).

The Parties will continue to meet and confer in good faith in accordance with DMO No. 8 and will provide the Court with a Supplement Status Report regarding the above items on July 26, 2024.

Respectfully submitted,

DATED: July 19, 2024

By: /s/ Lexi J. Hazam

LEXI J. HAZAM  
**LIEFF CABRASER HEIMANN &  
 BERNSTEIN, LLP**  
 275 BATTERY STREET, 29<sup>TH</sup> FLOOR  
 SAN FRANCISCO, CA 94111-3339  
 Telephone: 415-956-1000  
 lhazam@lchb.com

PREVIN WARREN  
**MOTLEY RICE LLC**  
 401 9th Street NW Suite 630  
 Washington DC 20004  
 Telephone: 202-386-9610  
 pwarren@motleyrice.com

Co-Lead Counsel

CHRISTOPHER A. SEEGER  
**SEEGER WEISS, LLP**  
 55 CHALLENGER ROAD, 6<sup>TH</sup> FLOOR  
 RIDGEFIELD PARK, NJ 07660  
 Telephone: 973-639-9100  
 cseeger@seegerweiss.com

Counsel to Co-Lead Counsel

JENNIE LEE ANDERSON  
**ANDRUS ANDERSON, LLP**  
 155 MONTGOMERY STREET, SUITE 900  
 SAN FRANCISCO, CA 94104  
 Telephone: 415-986-1400  
 jennie@andrusanderson.com

Liaison Counsel

EMILY C. JEFFCOTT  
**MORGAN & MORGAN**  
633 WEST FIFTH STREET, SUITE 2652  
LOS ANGELES, CA 90071  
Telephone: 213-787-8590  
ejeffcott@forthepeople.com

JOSEPH VANZANDT  
**BEASLEY ALLEN**  
234 COMMERCE STREET  
MONTGOMERY, LA 36103  
Telephone: 334-269-2343  
joseph.vanzandt@beasleyallen.com

Federal/State Liaisons

MATTHEW BERGMAN  
GLENN DRAPER  
**SOCIAL MEDIA VICTIMS LAW CENTER**  
821 SECOND AVENUE, SUITE 2100  
SEATTLE, WA 98104  
Telephone: 206-741-4862  
matt@socialmediavictims.org  
glenn@socialmediavictims.org

JAMES J. BILSBORROW  
**WEITZ & LUXENBERG, PC**  
700 BROADWAY  
NEW YORK, NY 10003  
Telephone: 212-558-5500  
jbilsborrow@weitzlux.com

JAYNE CONROY  
**SIMMONS HANLY CONROY, LLC**  
112 MADISON AVE, 7TH FLOOR  
NEW YORK, NY 10016  
Telephone: 917-882-5522  
jconroy@simmonsfirm.com

ANDRE MURA  
**GIBBS LAW GROUP, LLP**  
1111 BROADWAY, SUITE 2100  
OAKLAND, CA 94607  
Telephone: 510-350-9717  
amm@classlawgroup.com

ALEXANDRA WALSH  
**WALSH LAW**  
1050 Connecticut Ave, NW, Suite 500  
Washington D.C. 20036  
Telephone: 202-780-3014  
awalsh@alexwalshlaw.com

MICHAEL M. WEINKOWITZ  
**LEVIN SEDRAN & BERMAN, LLP**  
510 WALNUT STREET  
SUITE 500  
PHILADELPHIA, PA 19106  
Telephone: 215-592-1500  
mweinkowitz@lfsbalw.com

Plaintiffs' Steering Committee Leadership

RON AUSTIN  
**RON AUSTIN LAW**  
400 MANHATTAN BLVD.  
HARVEY, LA 70058  
Telephone: 504-227-8100  
raustin@ronaustinlaw.com

PAIGE BOLDT  
**WALSH LAW**  
4 Dominion Drive, Bldg. 3, Suite 100  
San Antonio, TX 78257  
Telephone: 210-448-0500  
PBoldt@alexwalshlaw.com

THOMAS P. CARTMELL  
**WAGSTAFF & CARTMELL LLP**  
4740 Grand Avenue, Suite 300  
Kansas City, MO 64112  
Telephone: 816-701-1100  
tcartmell@wcllp.com

SARAH EMERY  
**HENDY JOHNSON VAUGHN EMERY PSC**  
600 WEST MAIN STREET, SUITE 100  
LOUISVILLE, KY 40202  
Telephone: 859-600-6725  
semery@justicestartshere.com

1 CARRIE GOLDBERG  
2 **C.A. GOLDBERG, PLLC**  
3 16 Court St.  
4 Brooklyn, NY 11241  
5 Telephone: 646-666-8908  
6 carrie@cagoldberglaw.com

7 RONALD E. JOHNSON, JR.  
8 **HENDY JOHNSON VAUGHN EMERY PSC**  
9 600 WEST MAIN STREET, SUITE 100  
10 LOUISVILLE, KY 40202  
11 Telephone: 859-578-4444  
12 rjohnson@justicestartshere.com

13 SIN-TING MARY LIU  
14 **AYLSTOCK WITKIN KREIS &**  
15 **OVERHOLTZ, PLLC**  
16 17 EAST MAIN STREET, SUITE 200  
17 PENSACOLA, FL 32502  
18 Telephone: 510-698-9566  
19 mliu@awkolaw.com

20 JAMES MARSH  
21 **MARSH LAW FIRM PLLC**  
22 31 HUDSON YARDS, 11TH FLOOR  
23 NEW YORK, NY 10001-2170  
24 Telephone: 212-372-3030  
25 jamesmarsh@marshlaw.com

26 JOSEPH E. MELTER  
27 **KESSLER TOPAZ MELTZER & CHECK LLP**  
28 280 KING OF PRUSSIA ROAD  
RADNOR, PA 19087  
Telephone: 610-667-7706  
jmeltzer@ktmc.com

HILLARY NAPPI  
**HACH & ROSE LLP**  
112 Madison Avenue, 10th Floor  
New York, New York 10016  
Telephone: 212-213-8311  
hnappi@hrsclaw.com

EMMIE PAULOS  
**LEVIN PAPANTONIO RAFFERTY**  
316 SOUTH BAYLEN STREET, SUITE 600  
PENSACOLA, FL 32502  
Telephone: 850-435-7107  
epaulos@levinlaw.com

RUTH THI RIZKALLA  
**THE CARLSON LAW FIRM, PC**  
1500 ROSECRANS AVE., STE. 500  
MANHATTAN BEACH, CA 90266  
Telephone: 415-308-1915  
rrizkalla@carlsonattorneys.com

ROLAND TELLIS  
DAVID FERNANDES  
**BARON & BUDD, P.C.**  
15910 Ventura Boulevard, Suite 1600  
Encino, CA 91436  
Telephone: 818-839-2333  
rtellis@baronbudd.com  
dfernandes@baronbudd.com

MELISSA YEATES  
**KESSLER TOPAZ MELTZER & CHECK LLP**  
280 KING OF PRUSSIA ROAD  
RADNOR, PA 19087  
Telephone: 610-667-7706  
myeates@ktmc.com

DIANDRA "FU" DEBROSSE ZIMMERMANN  
**DICELLO LEVITT**  
505 20th St North  
Suite 1500  
Birmingham, Alabama 35203  
Telephone: 205-855-5700  
fu@dicellolevitt.com

Plaintiffs' Steering Committee Membership

*Attorneys for Individual Plaintiffs*

**PHILIP J. WEISER**

Attorney General  
State of Colorado

/s/ Bianca E. Miyata

Bianca E. Miyata, CO Reg. No. 42012,  
*pro hac vice*  
Senior Assistant Attorney General  
Lauren M. Dickey, CO Reg. No. 45773, *pro hac vice*  
First Assistant Attorney General  
Megan Paris Rundlet, CO Reg. No. 27474  
Senior Assistant Solicitor General  
Elizabeth Orem, CO Reg. No. 58309  
Assistant Attorney General  
Colorado Department of Law  
Ralph L. Carr Judicial Center  
Consumer Protection Section  
1300 Broadway, 7th Floor  
Denver, CO 80203  
Phone: (720) 508-6651  
bianca.miyata@coag.gov

*Attorneys for Plaintiff State of Colorado, ex rel.  
Philip J. Weiser, Attorney General*

**ROB BONTA**

Attorney General  
State of California

/s/ Megan O'Neill

Nicklas A. Akers  
Senior Assistant Attorney General  
Bernard Eskandari  
Emily Kalanithi  
Supervising Deputy Attorneys General  
Nayha Arora  
Megan O'Neill  
Joshua Olszewski-Jubelirer  
Marissa Roy  
Brendan Ruddy  
Deputy Attorneys General  
California Department of Justice  
Office of the Attorney General  
455 Golden Gate Ave., Suite 11000  
San Francisco, CA 94102-7004  
Phone: (415) 510-4400  
Fax: (415) 703-5480  
megan.oneill@doj.ca.gov



*Attorneys for Plaintiff the People of the State of California*

**RUSSELL COLEMAN**

Attorney General  
Commonwealth of Kentucky

/s/ J. Christian Lewis

J. Christian Lewis, *Pro hac vice*  
Philip Heleringer, *Pro hac vice*  
Zachary Richards, *Pro hac vice*  
Daniel I. Keiser, *Pro hac vice*  
Matthew Cocanougher, *Pro hac vice*  
Assistant Attorneys General  
1024 Capital Center Drive, Suite 200  
Frankfort, KY 40601  
christian.lewis@ky.gov  
philip.heleringer@ky.gov  
zach.richards@ky.gov  
daniel.keiser@ky.gov  
matthew.cocanougher@ky.gov  
Phone: (502) 696-5300  
Fax: (502) 564-2698

*Attorneys for Plaintiff the Commonwealth of Kentucky*

**MATTHEW J. PLATKIN**

Attorney General  
State of New Jersey

/s/ Kashif T. Chand

Kashif T. Chand, *Pro hac vice*  
Section Chief, Deputy Attorney General  
Thomas Huynh, *Pro hac vice*  
Assistant Section Chief, Deputy Attorney General  
Verna J. Pradaxay, *Pro hac vice*  
Mandy K. Wang, *Pro hac vice*  
Deputy Attorneys General  
New Jersey Office of the Attorney General,  
Division of Law  
124 Halsey Street, 5th Floor  
Newark, NJ 07101  
Tel: (973) 648-2052  
kashif.chand@law.njoag.gov  
thomas.huynh@law.njoag.gov  
verna.pradaxay@law.njoag.gov  
mandy.wang@law.njoag.gov

*Attorneys for Plaintiff New Jersey  
Division of Consumer Affairs*

COVINGTON & BURLING LLP

By: /s/ Ashley M. Simonsen  
Ashley M. Simonsen  
1999 Avenue of the Stars  
Los Angeles, CA 90067  
Telephone: (424) 332-4800  
Facsimile: + 1 (424) 332-4749  
Email: asimonsen@cov.com

Phyllis A. Jones, *pro hac vice*  
Paul W. Schmidt, *pro hac vice*  
COVINGTON & BURLING LLP  
One City Center  
850 Tenth Street, NW  
Washington, DC 20001-4956  
Telephone: + 1 (202) 662-6000  
Facsimile: + 1 (202) 662-6291  
Email: pajones@cov.com

*Attorney for Defendants Meta Platforms, Inc.  
f/k/a Facebook, Inc.; Facebook Holdings,  
LLC; Facebook Operations, LLC; Facebook  
Payments, Inc.; Facebook Technologies, LLC;  
Instagram, LLC; Siculus, Inc.; and Mark Elliot  
Zuckerberg*

FAEGRE DRINKER BIDDLE & REATH LLP

By: /s/ Andrea Roberts Pierson  
Andrea Roberts Pierson, *pro hac vice*  
300 N. Meridian Street, Suite 2500  
Indianapolis, IN 46204  
Telephone: + 1 (317) 237-0300  
Facsimile: + 1 (317) 237-1000  
Email: andrea.pierson@faegredrinker.com

Amy R. Fiterman, *pro hac vice*  
2200 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402  
Telephone: +1 (612) 766-7768  
Facsimile: +1 (612) 766-1600  
Email: amy.fiterman@faegredrinker.com

Geoffrey Drake, *pro hac vice*  
KING & SPALDING LLP  
1180 Peachtree Street, NE, Suite 1600  
Atlanta, GA 30309  
Tel.: 404-572-4600  
Email: gdrake@kslaw.com  
Email: dmattern@kslaw.com

David Mattern, *pro ha vice*  
KING & SPALDING LLP  
1700 Pennsylvania Avenue, NW, Suite 900  
Washington, D.C. 20006  
Telephone: +1 (202) 626-2946  
Email: dmattern@kslaw.com

*Attorneys for Defendants TikTok Inc. and ByteDance Inc.*

MUNGER, TOLLES & OLSEN LLP

By: /s/ Jonathan H. Blavin  
Jonathan H. Blavi  
560 Mission Street, 27th Floor  
San Francisco, CA 94105-3089  
Telephone: (415) 512-4000  
Facsimile: (415) 512-4077  
Email: jonathan.blavin@mto.com

Rose L. Ehler  
Victoria A. Degtyareva  
Laura M. Lopez  
Ariel T. Teshuva  
MUNGER, TOLLES & OLSON LLP  
350 South Grand Avenue, 50th Floor  
Los Angeles, CA 90071-3426  
Telephone: (213) 683-9100  
Facsimile: (213) 687-3702  
Email: rose.ehler@mto.com  
Email: victoria.degtyareva@mto.com  
Email: Ariel.Teshuva@mto.com

Lauren A. Bell (*pro hac vice forthcoming*)  
MUNGER, TOLLES & OLSON LLP  
601 Massachusetts Ave., NW St., Suite 500 E  
Washington, D.C. 20001-5369  
Telephone: (202) 220-1100  
Facsimile: (202) 220-2300

Email: lauren.bell@mto.com

*Attorneys for Defendant Snap Inc.*

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

By: /s/ Brian M. Willen

Brian M. Willen (*pro hac vice*)  
1301 Avenue of the Americas, 40th Floor  
New York, New York 10019  
Telephone: (212) 999-5800  
Facsimile: (212) 999-5899  
Email: bwillen@wsgr.com

Lauren Gallo White  
Samantha A. Machock  
WILSON SONSINI GOODRICH & ROSATI  
One Market Plaza, Spear Tower, Suite 3300  
San Francisco, CA 94105  
Telephone: (415) 947-2000  
Facsimile: (415) 947-2099  
Email: lwhite@wsgr.com  
Email: smachock@wsgr.com

Christopher Chiou  
Matthew K. Donohue  
WILSON SONSINI GOODRICH & ROSATI  
953 East Third Street, Suite 100  
Los Angeles, CA 90013  
Telephone: (323) 210-2900  
Facsimile: (866) 974-7329  
Email: cchiou@wsgr.com  
Email: mdonohue@wsgr.com

*Attorneys for Defendants YouTube, LLC and Google LLC*

WILLIAMS & CONNOLLY LLP

By: /s/ Joseph G. Petrosinelli  
Joseph G. Petrosinelli (*pro hac vice*)  
jpetrosinelli@wc.com  
Ashley W. Hardin (*pro hac vice*)  
ahardin@wc.com  
680 Maine Avenue, SW  
Washington, DC 20024  
Telephone.: 202-434-5000

Fax: 202-434-5029

*Attorneys for Defendants YouTube, LLC and Google LLC*

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Yardena R. Zwang-Weissman

Yardena R. Zwang-Weissman

300 South Grand Avenue, 22nd Floor

Los Angeles, CA 90071-3132

Tel.: 213.612.7238

Email: yardena.zwang-weissman@morganlewis.com

Brian Ercole (*pro hac vice*)

600 Brickell Avenue, Suite 1600

Miami, FL 33131-3075

Tel.: 305.415.3416

Email: brian.ercole@morganlewis.com

Stephanie Schuster (*pro hac vice*)

1111 Pennsylvania Avenue NW

NW Washington, DC 20004-2541

Tel.: 202.373.6595

Email: stephanie.schuster@morganlewis.com

*Attorneys for Defendants YouTube, LLC and Google LLC*

**ATTESTATION**

I, Andrea R. Pierson, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: July 19, 2024

By: /s/ Andrea R. Pierson

Andrea R. Pierson